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March 31, 2020

BY ECF

Judge Mary Kay Vyskocil
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Xiamin Zeng v. City of New York, et al.
20-CV-00451 (MKV)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department, and the attorney assigned to the defense of the above-referenced matter. In that capacity, the undersigned writes to respectfully request a ninety (90) day stay of this litigation, including all scheduled deadlines, the answer to the complaint on behalf of defendant City, and discovery, in light of the current pandemic. The undersigned was unable to reach plaintiff to gain her consent to this request because she has not provided a working phone number or email address on the docket sheet. This is defendant City's first request for such a stay.

As the Court is aware, the country is currently grappling with the COVID-19, or coronavirus, pandemic. On March 7, 2020, Governor Andrew Cuomo declared that New York is in a state of emergency because of the rapidly developing pandemic situation. On March 13, 2020, Mayor Bill de Blasio followed suit, and declared New York City to be in a state of emergency as well. Further, on March 20, 2020, Governor Cuomo signed the "New York State On Pause" Executive Order, mandating that all non-essential personnel stay at home. In light of pronouncements from government officials, associated policies, expert recommendations, and the citywide efforts to curb the further spread of COVID-19, the New York City Law Department, along with the majority of employers in New York City beginning on or about March 15, 2020, increasingly transitioned its workforce to work from home status.

Due to the fact that the aforementioned recent developments have caused (1) this Office to reduce its in-office workforce to essential employees only, (2) the state courts to halt non-critical functions, and (3) health providers, businesses, and agencies throughout New York City and state to overwhelmingly reduce their in-office workforce, there has been a significant disruption in normal business functions that has affected the undersigned's ability to defend this matter. Specifically, at a minimum, the undersigned is unable to confer with and/or obtain discovery documents from the courts, the school, district attorney's office, the police department, and/or health care providers. The undersigned also notes that resolving representation, to the extent that service of process can be effected at this time, is going to be extremely difficult as the New York City Police Department focuses its resources on responding to the pandemic. As such, this Office respectfully requests a ninety (90) day stay of this matter.

Thank you for your consideration herein.

Respectfully submitted,

Stephanie De Angelis/s/


Stephanie De Angelis

Assistant Corporation Counsel

cc: By First Class Mail
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GRANTED. The action is stayed for 90 days. Counsel for the City of New York is directed to update the Court, and request a further extension of the stay if appropriate, no later than June 23, 2020. SO ORDERED.

Date: 4/1/2020
New York, New York


Mary Kay Vyskocil
United States District Judge